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#### REMARKS/ARGUMENTS

Reconsideration is requested in view of the following remarks. Claims 1, 8, 15 and 22 have been editorially revised without adding new subject matter. Support for the claims revisions can be found on page 4, lines 14-15 and page 5, lines 28-31, among other places. Claims 1-22 remain pending in the application.

#### Claim Rejections – 35 USC §103

Claims 1-22 are rejected under 35 U.S.C. §103(a) as unpatentable over Pub. No.: US2004/0215664 A1 of Hennings et al. (Hennings) in view of U.S. 6,304,886 B1 to Bernardo et al. Applicants respectfully traverse this rejection.

Claim 1 is directed to a method for adding an HTML document to a web site, the HTML document relating to a respective one of a plurality of categories of information, the method comprising the steps of:

adding an HTML keyword to the HTML document wherein the HTML keyword represents the respective one of the plurality of categories of information;

uploading the HTML document to a directory on the web site, wherein the directory corresponds solely with the category of information represented by the HTML keyword;

activating a search in the directory when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword;

calling a search engine to execute the activated search and produce a search result wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword; and

creating an up-to-date web page for the respective one of the plurality of categories of information from the search result wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword, such that the HTML documents are automatically available for reading without creating specific web pages to access the HTML documents and without using a database.

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This method is particularly advantageous in that the activated search does not require access to a database containing HTML documents, nor does the activated search engine produce a search result that identifies links to websites containing HTML documents.

The rejection asserts that Hennings teaches activating a search in the directory when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword and calling a search engine to execute the activated search and produce a search result wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword.

The rejection relies on sections 0062 and 0093-0094 to support teaching activating a search in the directory when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword (searching a web page that matches the category or keyword).

Sections 0062 and 0093-0094 teach only invoking a data promotion engine to first parse through the content of the design page document in search of desired category entries. When a desired category entry is identified within the design page document, the data promotion engine then parses through all of the contextual information files on the site, not just those HTML documents within the desired category or directory such as required by claim 1, to identify any documents that are assigned to the desired category. The data promotion engine then generates the HTML code to insert hyperlinks into the pages that have been assigned to the matching category.

Thus, the search disclosed by Hennings is a two step process that first parses through category list components in a design page to locate a desired category entry. The search disclosed by Hennings then parses through all the HTML document contextual information files on the site to identify any HTML documents that are assigned to the desired category entry.

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Thus, the data promotion engine of Hennings is a two step process that uses a time consuming search of all HTML documents on a web site.

In contradistinction, the search of claim 1 is a one step process that executes a directory search of HTML keywords only within a directory containing those HTML documents having the corresponding HTML keyword, to identify links to the HTML documents only in the directory containing the corresponding HTML keyword. Because the HTML documents in the directory already include keywords that identify a particular category, the search of claim 1 does not require parsing through category list components to locate a desired category such as required by the invention of Hennings. The search of claim 1, unlike the search of Hennings, commences searching through only the HTML documents uploaded into the corresponding directory immediately upon selecting the keyword that corresponds to the desired category. The claimed one step search process is therefore more efficient and less time consuming than the two step process disclosed by Hennings.

The invention of Hennings therefore nowhere discloses or suggests activating a search only in the directory that includes uploaded HTML documents having an HTML keyword when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword that forms part of an HTML document and that represents the respective one of the plurality of categories of information as required by claim 1.

The rejection further relies on section 0093 to support teaching calling a search engine to execute the activated search and produce a search result wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword (invoking or calling a search to generate hyperlinks that correspond to each of the category list to the HTML document or web page or in a given design page).

Claim 1 requires activating a search in the directory when the respective one of the plurality of categories of information is selected, the search containing at least the

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HTML keyword, and calling a search engine to execute the activated search and produce a search result wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword.

The search engine disclosed by Hennings first parses through the category list components on the web page to locate a desired category document which is a referring document. This category list component search is required by the invention of Hennings because the search is not capable of immediately searching through HTML documents on the web site without first identifying the desired category document from the category list components. The desired category list document is then a referring document. All of the HTML document contextual information files on the site, not just those HTML documents associated with the desired category such as required by claim 1, are then parsed to identify any documents that are assigned to the referring document. Hyperlinks are then added to each HTML document that has been assigned to the desired category represented by the referring document.

The invention of claim 1 does not search through all HTML documents on a web site as disclosed by Hennings, but only searches through those HTML documents uploaded to a corresponding directory to create the hyperlinks to those documents.

The rejection further incorrectly asserts that it would have been obvious to a person of ordinary skill in the art to combine the teachings of Hennings with the teachings of Barnardo to teach the claimed HTML documents are automatically available for reading without creating specific web pages to access the HTML documents and without using a database.

The invention of Barnardo does not teach or suggest the claimed documents are automatically available for reading without creating specific web pages to access the HTML documents and without using a database. The invention of Barnardo teaches only the creation of a web site that requires a plurality (library) of pre-stored templates, comprising HTML formatting code, text, fields and formulas for use in simplifying the

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creation of web sites (column 5, lines 51-54). The invention of Barnardo therefore stores a database (library) of pre-stored templates), as described throughout the Barnardo reference, including the abstract, to create a web site, and bears no resemblance to the claimed HTML documents that are uploaded into a directory and are automatically available for reading without creating specific web pages to access the HTML documents and without using a database.

The problems resolved by the invention of Barnardo and the theories of operation taught by Barnardo bear no resemblance to the problems resolved by the claimed invention or the theory of operation of the claimed invention; and so no motivation exists to combine the teachings of Hennings with the teaching of Barnardo that teaches only creation of a web page without accessing or requiring the web site creator to write HTML code.

Further, Barnardo teaches only access to an original web site document that has been created using a software tool. Barnardo nowhere teaches or suggests accessing an HTML document that has been uploaded to a web site directory as required by claim 1.

Barnardo therefore fails to teach or disclose the claimed HTML documents are automatically available for reading without creating specific web pages to access the HTML documents and without using a database.

For at least these reasons, claim 1 is patentable over the cited art, alone or in combination. Applicants do not concede the correctness of the rejection or the relevance of the references to the remaining claim features.

Regarding claim 4, the rejection incorrectly asserts Hennings teaches wherein the HTML keyword is added to the HTML header (section 0008). Although section [0008] describes the HTML language is used for writing hypertext documents, nowhere does section [0008] or any other section of Hennings teach or suggest adding an HTML

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keyword to the HTML header. At best, Hennings discloses only application of start tags and end tags to an HTML header.

For at least these reasons, claim 4 is patentable over Hennings. Claim 4 is also patentable since it depends from claim 1 that is allowable. Applicants do not concede the correctness of the rejection.

Regarding claim 5, the rejection incorrectly asserts Hennings teaches wherein the HTML keyword is added to the metatag field of the HTML header (sections 0008 and 0092). Although sections [0008] and [00092] together teach adding a category meta-data entry that is used to assign a category to the page (the HTML document) with which the contextual information file is associated, the meta-data entry of Hennings is only added to the body section of the HTML code that contains the contextual information, and not the header section, as described with reference to Figure 4 of Hennings in sections [0066]-[0070]. Nowhere does Hennings teach or suggest adding an HTML keyword to the metatag field of the HTML header.

For at least these reasons, claim 5 is patentable over Hennings. Claim 5 is also patentable since it depends ultimately from claim 1 that is allowable. Applicants do not concede the correctness of the rejection.

Claims 2-3 and 6-7 are also patentable over the cited art since they depend from claim 1 that is allowable. Applicants do not concede the correctness of the rejections or the relevance of the cited references to the respective claim features.

Regarding claim 8, the patentable features of claim 8 correspond to the patentable features of claim 1; and so claim 8 is patentable over the cited art for the same reasons discussed above regarding claim 1. Applicants do not concede the correctness of the rejection or the relevance of the cited references to the remaining claim features.

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Regarding claim 11, the patentable features of claim 11 correspond to the patentable features of claim 4; and so claim 11 is patentable over the cited art for the same reasons discussed above regarding claim 4. Applicants do not concede the correctness of the rejection.

Regarding claim 12, the patentable features of claim 12 correspond to the patentable features of claim 5; and so claim 12 is patentable over the cited art for the same reasons discussed above regarding claim 5. Applicants do not concede the correctness of the rejection.

Claims 9-10 and 13-14 are also patentable over the cited art since they depend ultimately from claim 8 that is allowable. Applicants do not concede the correctness of the rejections or the relevance of the cited references to the respective claim features.

Regarding claim 15, the patentable features of claim 15 correspond to the patentable features of claim 1; and so claim 15 is patentable over the cited art for the same reasons discussed above regarding claim 1. Applicants do not concede the correctness of the rejection or the relevance of the cited references to the remaining claim features.

Regarding claim 20, the rejection asserts Hennings teaches creating a hypertext reference is dynamically performed by the search engine while the search engine searches the at least one searchable HTML document in the respective directory relating to the respective one of the plurality of categories (figs. 2, 8 and 9 and sections 0036-0037, 0061-0062, 0090 and abstract).

Hennings nowhere teaches searching the at least one searchable HTML document in the respective directory relating to the respective one of the plurality of categories since the theory of operation disclosed by Hennings requires searching all HTML documents on a web site to identify any HTML documents that are assigned to the desired category entry.

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For at least these reasons, claim 20 is patentable over Hennings. Claim 20 is also patentable over Hennings since it depends ultimately from claim 1 that is allowable. Applicants do not concede the correctness of the rejection.

Regarding claim 21, the patentable features of claim 21 correspond to the patentable features of claim 5; and so claim 21 is patentable over the cited art for the same reasons discussed above regarding claim 5. Applicants do not concede the correctness of the rejection.

Regarding claim 22, the patentable features of claim 22 correspond to the patentable features of claim 1; and so claim 22 is patentable over the cited art for the same reasons discussed above regarding claim 1. Applicants do not concede the correctness of the rejection or the relevance of the cited references to the remaining claim features.

Favorable reconsideration in the form of a Notice of Allowance is requested. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at (507) 351-4450.

Respectfully submitted,

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